

All Cases: Debtor(s) Meldon R. Dobson and Natasha A. Dobson Case No. 19-03328 Chapter 13

All Cases: Name of Moving Creditor VW CREDIT INC. D/B/A AUDI FINANCIAL SERVICES  
Date Case Filed 2/8/19

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 5/2/19

Chapter 7: No-Asset Report Filed on \_\_\_\_\_  
No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a. Home \_\_\_\_\_
  - b. X Car Year, Make and Model 2017 Audi Q7
  - c. Other \_\_\_\_\_
2. Balance Owed as of Petition Date \$38,477.74  
Total of all other Liens against Collateral \$ \_\_\_\_\_
3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral \$37,700.00
5. Default
  - a. Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
  - b. X Post-Petition Default
    - i. X On direct payments to the moving creditor  
Number of months 3.5 as of 11/6/19 Amount \$3,896.97, including attorney fees and court costs.
    - ii. On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a. Lack of Adequate Protection § 362 (d)(1)
    - i. No insurance
    - ii. Taxes unpaid Amount \$ \_\_\_\_\_
    - iii. Rapidly depreciating asset \_\_\_\_\_
    - iv. Other \_\_\_\_\_
  - b. No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
  - c. Other "Cause" § 362 (d)(1)
    - i. Bad Faith (describe) \_\_\_\_\_
    - ii. Multiple filings \_\_\_\_\_
    - iii. Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i. Reaffirm
    - ii. Redeem
    - iii. Surrender
    - iv. No Statement of Intention Filed

Date: 11/11/19

/s/ Terri M. Long  
Counsel for Movant